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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

RYAN SMITH, individually and JAMES
“JAY” GRYBOWSKI, individually,

CASE NO: 2:15-cv-484-GMN-VCF

Plaintiffs,

SECOND OMNIBUS STIPULATION AND
[PROPOSED] ORDER

vs.

HEWLETT-PACKARD COMPANY,
HEWLETT PACKARD ENTERPRISE
COMPANY; and HP INC.,

Defendant.

Plaintiffs RYAN SMITH and JAY GRYBOWSKI, by and through their attorney of record, Andre M. Lagomarsino, Esq., of the law firm Lagomarsino Law, and Defendants HEWLETT-PACKARD COMPANY, HEWLETT PACKARD ENTERPRISE COMPANY; and HP INC., by and through their attorneys of record, Roger L. Grandgenett II, Esq., Montgomery Paek, Esq. and Bruce Young, Esq., of the law firm LITTLER MENDELSON, PC, for good cause hereby stipulate as follows:

1. The parties agree that the Plaintiffs may file a motion to compel up through and including July 1, 2016 on any of the issues in Plaintiffs’ counsel’s June 8, 2016 email, June 9, 2016 letter and June 23, 2016 email that the parties have been meeting and conferring on and pertaining to Defendants’ Responses to Plaintiffs’ Request for Production of Documents and Defendants’ Privilege Log. The new deadline of July 1, 2016 will provide the

Defendants with enough time to facilitate the requested documents as well as the Plaintiffs to review the same to see if any of the meet and confer issues remain.

2. The following cause of action from Plaintiffs' First Amended Complaint shall be dismissed with prejudice, with each party to bear its own costs and attorney fees:

(a) Seventh Cause of Action (Retaliation under Title VII).

DATED this 23rd day of June, 2016.

DATED this 23rd day of June, 2016.

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LITTLER MENDELSON, PC

/s/ Andre M. Lagomarsino, Esq.
 Andre M. Lagomarsino, Esq.
 3005 West Horizon Ridge Parkway, Suite 241
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Attorney for Plaintiffs

/s/ Montgomery Paek, Esq.
 Roger L. Grandgenett II, Esq.
 Montgomery Paek, Esq.
 3960 Howard Hughes Parkway, Suite 300
 Las Vegas, Nevada 89169
Counsel for Defendants

ORDER

IT IS SO ORDERED:


 UNITED STATES DISTRICT COURT JUDGE

DATED this 27 day of June, 2016.